

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 323, 324

**ORDER GRANTING MOTION TO FILE UNDER SEAL REPLY IN
FURTHER SUPPORT OF MOTION OF HON HAI PRECISION INDUSTRY
CO., LTD. (A/K/A HON HAI TECHNOLOGY GROUP), FOXCONN EV
TECHNOLOGY, INC., AND FOXCONN EV SYSTEM LLC TO DISMISS, OR,
IN THE ALTERNATIVE, CONVERT THE BANKRUPTCY CASES**

Upon the *Motion to File Under Seal Reply in Further Support of Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases* (the “Motion to Seal”)² for entry of an order authorizing the Movants to file under seal the *Reply in Further Support of Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases* (D.I. 323) (the “Reply”) and the *Declaration of Michael Whalen* (D.I. 324) (the “Declaration”); the Court having reviewed the Motion to Seal and the responses thereto, if any; and the Court having determined that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms not defined herein are used as defined in the Motion to Seal.

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED.
2. The Movants are hereby authorized to file the unredacted Reply and Declaration under seal.
3. Absent further order of the Court, the unredacted versions of the Reply and Declaration shall not be made available to anyone except for this Court, the Debtors, the Official Committee of Unsecured Creditors and the U.S. Trustee, unless and until permitted by further order of this Court. Absent further order of the Court, each party receiving unredacted copies of the Reply and Declaration shall treat such documents and confidential pursuant to Local Rule 9018-1(f) and any applicable confidentiality or protective order.
4. The Movants are authorized to file on this Court's docket and to serve on other parties in interest redacted copies of the Reply and Declaration, redacting the Documents and any references thereto.
5. The Movants are authorized to take all actions necessary to effectuate the relief granted herein.
6. The Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.